

**PANISH  
SHEA &  
BOYLE**  
LLP

June 16, 2020

**VIA ECF**

Hon. Debra C. Freeman  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

**Re: Jane Doe, 1:20-cv-00484-JGK-DCF**

Dear Judge Freeman:

Pursuant to the Court's Text Order in the above-referenced case entered on June 15, 2020 regarding Plaintiff's Motion to Approve Alternate Service on Defendant Ghislaine Maxwell, Plaintiff has served Ms. Maxwell with a copy of the Text Order by emailing it to Ms. Maxwell's counsel of record in the Farmer case, Laura Menninger, and is now hereby filing proof of such service on the Docket of this action. A copy of such proof of service is attached hereto.

Very truly yours,

  
Robert S. Glassman

RSG

**Keilah Betts**

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**Sent:** Tuesday, June 16, 2020 7:05 AM  
**To:** lmenninger@hmflaw.com  
**Cc:** Robert Glassman; Nathan Werksman; Claudia Lomeli  
**Subject:** Doe v. Indyke et al: Ghislaine Maxwell  
**Attachments:** Activity in Case 1:20-cv-00484-JGK-DCF Doe v. Indyke et al Order on Motion for Miscellaneous Relief

**Importance:** High

Dear Ms. Menninger – Please be advised that the Court has issued the attached minute order concerning service on your client Ghislaine Maxwell. Plaintiff was ordered to give notice to you of this order via e-mail.

**Docket Text:**

**ORDER granting [43] Motion To Approve Alternate Service on Defendant Ghislaine Maxwell ("Maxwell"). Plaintiff's motion is unopposed, and, based on Plaintiff's representations regarding her unsuccessful efforts to locate Maxwell's current residence, her fruitless attempts to serve Maxwell at multiple locations, her equally fruitless attempts to contact Maxwell via several email addresses publicly associated with Maxwell, and her rejected request to Maxwell's known litigation counsel to accept service on Maxwell's behalf, this Court finds that Plaintiff has adequately demonstrated that she has made diligent efforts to effect service, and that personal service would be impracticable. See *Ransome v. Epstein*, No. 17cv616 (JGK), 2018 WL 637421, at \*1 (S.D.N.Y. Jan. 30, 2018); see also *Farmer v. Indyke*, No. 19cv10475 (LGS)(DF) (Text Order, dated Feb. 12, 2020). This Court further finds that Plaintiff's provision of a copy of the Summons and Complaint by email to Maxwell's current counsel of record in the Farmer case (see Declaration of Robert S. Glassman, dated May 27, 2020 (Dkt. 43-2), Ex. 3) was reasonably calculated to place Maxwell on notice of this suit and to constitute sufficient service under the circumstances presented here. No later than 6/18/20, Plaintiff is directed to serve Maxwell with a copy of this Text Order by the same means (i.e., by email to Maxwell's counsel of record in the Farmer case), and to file proof of such service on the Docket of this action. Maxwell may then have until 7/9/20 to move, answer, or otherwise respond to the Complaint. (HEREBY ORDERED by Magistrate Judge Debra Freeman)(Text Only Order) (Freeman, Debra)**

Keilah Betts

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